

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE

MMA LAW FIRM, PLLC

DEBTOR

CRISTOBAL M. GALINDO, P.C.

D/B/A GALINDO LAW

Plaintiff

VS.

MMA LAW FIRM, PLLC.

Defendant

Chapter 11

Case No. 24-31596

Adv. P. No. 25-03310

AGREED EMERGENCY MOTION TO MODIFY SCHEDULING ORDER

THIS APPLICATION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE APPLICATION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE APPLICATION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE APPLICATION AT THE HEARING.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE CHIEF UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, MMA Law Firm, PLLC (“MMA”) and Cristobal M. Galindo, P.C. d/b/a Galindo Law Firm (“Galindo”) (together, the “Parties”), and file this *Agreed Emergency Motion to Modify Scheduling Order*, and respectfully show the Court the following.

RELEVANT BACKGROUND FACTS

1. On April 28, 2025, the Court entered a Comprehensive Scheduling, Pre-Trial and Trial Order [ECF No. 2] (the “**Scheduling Order**”).
2. On June 23, 2025, Galindo served MMA with extensive written discovery related to thousands of cases (the “**Discovery**”).
3. MMA requested a 30-day extension to respond to the Discovery, through and including August 22, 2025.
4. Galindo agreed to MMA’s extension request, conditioned upon a corresponding and reasonable extension of several deadlines set forth in the Scheduling Order. The Parties jointly request that the following deadlines be modified as follows:
 - a. **Close of Fact Discovery**: extended from August 26, 2025 to September 9, 2025.
 - b. **Deadline for Party with Burden of Proof to Serve Expert Reports**: extended from September 9, 2025 to September 23, 2025.
 - c. **Deadline to Serve Rebuttal Expert Reports**: extended from September 23, 2025, to October 7, 2025.
 - d. **Close of Expert Discovery**: extended from October 7, 2025, to October 21, 2025.

RELIEF REQUESTED

5. Emergency relief is necessary because Galindo conditioned its agreement to MMA’s requested extension on the Court’s approval of the modified Scheduling Order so that the Parties have sufficient time to conclude discovery after MMA has produced the requested documents.

Without a timely ruling, MMA would be required to file a separate emergency motion to extend the discovery response deadline. Granting this motion avoids that result and reflects a fair and mutually agreed extension that benefits both Parties.

6. The relief requested is minimal, reasonable, and fully agreed upon by both Parties.

7. Accordingly, the Parties respectfully request that the Court enter the attached agreed order modifying the Scheduling Order to reflect the revised deadlines.

Dated: July 28, 2025.

Respectfully submitted,

By: /s/ Miriam T. Goott

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